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Attorney for Defendant Stephen Cheung and non-parties Rosanna Cheung, Marcus Cheung, and Herman Cheung

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

LEONARD EDELSON,

Civil Action Number
1:20-mc-01995-UAD

Plaintiff,

vs.

DECLARATION
IN OPPOSITION

STEPHEN CHEUNG,

Defendant.

X

- I, Stephen Cheung, hereby declare under penalty of perjury under the laws of the United States of America that the following is true and correct:
  - 1. I am the defendant in this action and as the plaintiff should already know I reside at 4204-222 Street, Bayside, New York 11361. I write this declaration in opposition to plaintiff's motion
  - 2. My house does not have a "Ring doorbell" as counsel suggests. It has a traditional doorbell. See Attachment 1. I have not evaded service of the subpoenas that plaintiff is attempting to serve on me and my family. Rather it appears that plaintiff's process server is attempting service either at a wrong location or effectuating "sewer service".
  - 3. Both of the bank accounts that plaintiff is seeking a turnover order for are exempt from collection. Chase Account No. 3195 is sole repository of my Social Security payments, which I understand from counsel are exempt from collection. My account statement is attached hereto as 2.
  - 4. Chase Account No. 0552 listed in plaintiff's application is a safe deposit box located at the Chase Chinatown location. This box contains exempt property as well because it is solely owned by my wife. It primary contains important documents and inherited jewelry belonging to my wife. A billing statement showing that the box is in my wife's name is attached hereto as Exhibit 3

5. As the property that plaintiff is seeking a turnover order for is entirely exempt, I respectfully request that plaintiff's application be denied.

Dated: March 2,2021 New York, N.Y.

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5. As the property that plaintiff is seeking a turnover order for is entirely exempt, I respectfully request that plaintiff's application be denied.

Dated: March <sup>2</sup>,2021 New York, N.Y.

Stephen Cheung